REMARKS

Claims 1-14, 16-25, 27-29, 31-42, 44-49, 51-62 and 64-66 are pending. Reconsideration of the claim rejections is requested in view of the remarks set forth below. All independent claims are rejected under 35 U.S.C. § 103(a); claims 1, 23 and 27 based on *Zamir* in view of *Tso*, and claims 31, 47 and 51 based on that combination further in view of *Mukherjea*, all previously of record.

Applicants note the Examiner's general objection to claims 1-14 and 16-25. In this regard, the Examiner will note that independent claims 1 and 23 have been rearranged to present the claimed subject matter in paragraph form. These "amendments" are solely directed to matters of form and are not intended to narrow the scope of any claim. It is hoped that this change in format will make it easier to read claims 1 and 23, and as a result, easier to see the distinctions between the present invention and the teachings of the cited references. A minor, non-narrowing amendment has also been made to claim 25 to correct a grammatical error.

The main issue at this stage of the prosecution is the teachings of *Zamir* and *Tso* with respect to applicants' claimed clustering result and non-hierarchical clustering result summary table. The other cited references are not relevant to this issue and are only applied as allegedly teaching other aspects of the claimed invention.

In *Zamir's* process some, but not all, search results assigned to a particular cluster are shown, as evidenced by Fig. 2 of *Zamir*. In *Tso's* search result generation/presentation, only clustered search results are shown; no summary table, non-hierarchical or otherwise, is generated.

It can be seen that the table shown in Fig. 2 of *Zamir* meets neither applicants' claimed clustering result, which comprises all of the search results of each of the plurality of clusters, nor the claimed non-hierarchical clustering result summary table, which contains no search results. The Examiner now appears to be taking the position that the first two columns of the table in Fig. 2 of *Zamir* represent the summary table and the last column is the clustering result. One problem with this interpretation is that it is contrary to the claim

language that the summary table and the clustering result are distinct. Another problem with this interpretation is that each cell in the last column contains up to three sample titles of documents in the corresponding cluster. <u>This restriction is imposed by *Zamir* itself in the legend of Fig. 2, which has the effect of teaching away from an arrangement in which all of the search results assigned to a particular cluster are shown</u>. Thus, it is clear that the last column of the *Zamir's* table in Fig. 2 does not contain all of the search results, and therefore does not meet the claimed requirement that the clustering result contain all of the search results. Moreover, there is no suggestion or motivation for modifying *Zamir* to include all search results, as such modification is contrary to the teachings of the reference itself

Accordingly, *Zamir* fails to show or teach a clustering process in which a clustering result containing all search results of the clusters and a non-hierarchical clustering result summary table containing no search results are generated and output together, as specified in each of the independent claims. *Tso* does not remedy the shortcomings of *Zamir*, and the other cited references are not relevant to this issue.

In view of the foregoing amendments and remarks, Applicants respectfully submit that all pending claims of the present application are allowable.

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